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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all other
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JOHN A.
 YANCHUNIS IN SUPPORT OF
 PLAINTIFFS' MOTION TO
 COMPEL RE: P3**

DECLARATION OF JOHN A. YANCHUNIS

I, John A. Yanchunis, declare as follows:

1. I am a partner with the law firm of Morgan & Morgan, P.A., counsel for Plaintiffs in this matter.

2. Pursuant to the Court's June 8, 2021 Order on May 26, 2021 Joint Discovery Submission, Dkt. 191, 191-1, I submit this Declaration providing foundation and a brief explanation of the attachments.

3. Exhibit 1: Google produced this document on April 14, 2021, Bates Labeled GOOG-BRWN-00028920. Google designated this document as Confidential. [REDACTED]

[REDACTED]

4. Exhibit 2: Google produced this document on June 9, 2021, Bates Labeled GOOG-BRWN-00078395-99. Google designated this document as Highly Confidential – Attorneys' Eyes Only. [REDACTED]

[REDACTED]

5. Exhibit 3: This is Google's correspondence responding to Plaintiffs' questions concerning the production reflected in Exhibit 2, above. On June 9, 2021, Google produced what it purports to be Plaintiffs' unauthenticated data based on Plaintiffs' cookie values from private browsing sessions. On June 10, 2021, Plaintiffs met and conferred with Google to discuss the production. At Google's request, Plaintiffs put their inquiry in writing to Google on June 10, 2021. Google responded with this correspondence on June 15, 2021.

6. Exhibit 4: This is Plaintiffs' April 27, 2021, Notice of Deposition pursuant to Rule 30(b)(6).

7. Exhibit 5: This is the June 16, 2021, deposition transcript from Google's Rule 30(b)(6) designated corporate representative Dr. Glenn Berntson. Google designated this transcript as Confidential, and it contains documents that Google has designated as Confidential and Highly Confidential – Attorneys' Eyes Only.

